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*Attorneys for Defendants Coinbase Global, Inc.,  
Brian Armstrong, Alesia J. Haas,  
Emilie Choi, Paul Grewal, Jennifer Jones, Marc Andreessen,  
Frederick Ernest Ehrsam III, Kathryn Haun, Kelly Kramer,  
Gokul Rajaram, and Fred Wilson*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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IN RE COINBASE GLOBAL, INC.,  
SECURITIES LITIGATION

Civil Action No. 2:22-cv-04915-BRM-LDW

Hon. Brian R. Martinotti  
Hon. Leda Dunn Wettre

**NOTICE OF MOTION TO ENFORCE  
AUTOMATIC DISCOVERY STAY**

**Oral Argument Requested**

**Motion Day:** March 17, 2025

**PLEASE TAKE NOTICE** that on March 17, 2025, or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendants Coinbase Global, Inc. (“Coinbase”), Brian Armstrong, Alesia J. Haas, Emilie Choi, Paul Grewal, Jennifer Jones, Marc Andreessen, Frederick Ernest Ehrsam III, Kathryn Haun, Kelly Kramer, Gokul Rajaram, and Fred Wilson (the “Individual Defendants” and together with Coinbase, “Defendants”), shall move for an order enforcing the automatic discovery stay pursuant to the Private Securities Litigation Reform Act (the “Motion to Stay”) before The Honorable Brian R. Martinotti, United States District Judge, at the United States District Court for the District of New Jersey, Martin Luther King, Jr. Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion to Stay, the Defendants will rely upon the Memorandum of Law in Support of the Motion to Enforce Automatic Discovery Stay, as well as any submissions offered on reply.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is also submitted herewith.

Dated: February 13, 2025

Respectfully submitted,

**LATHAM & WATKINS LLP**

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